

DAN M. WINDER, ESQ.  
Nevada State Bar No. 1569  
ARNOLD WEINSTOCK  
Nevada State Bar No. 810  
SCOTT C. DORMAN, ESQ.  
Nevada State Bar No. 13108  
LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd.  
Las Vegas, NV 89102  
Telephone: (702) 474-0523  
Facsimile: (702) 474-0631  
winderdanatty@aol.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PATRICIA KENNEDY, an individual,  
  
Plaintiff,  
  
vs.

Case No: 2:14-cv-01678-RFB-(PAL)

UNIVERSITY MEDICAL CENTER a.k.a.  
UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA a.k.a. UMC, a  
political subdivision of Nevada; DOUG  
SPRING, in his official capacity as Director of  
Human Resources at UMC; GLEN  
MACINTYRE, individually and in his official  
capacity as Director of Risk Management at  
UMC; STEVE WINKLE, individually and in  
his official capacity as Licensed Clinical Social  
Worker at UMC; DOES I-V; ROES VI-X,  
  
Defendants.

**STIPULATION AND ORDER  
REGARDING RESPONSE TO SUMMARY  
JUDGMENT MOTION**

Plaintiff Patricia Kennedy, by and through her attorney, Dan M. Winder, Esq. of the Law

Office of Dan M. Winder, P.C., and Defendants University Medical Center, Doug Spring, Glen MacIntyre, Steve Winkle, by and through their attorney, Jeffrey I. Pitegoff, Esq., hereby stipulate and agree:

1. The deadline for the Plaintiff's response to the Defendants' motion for summary judgment (DKT. 50) is hereby extended to March 4, 2016.
2. The deadline for the Defendant's reply to the Plaintiff's response to the Defendants' motion for summary judgment is hereby extended a corresponding 4 days.

The above stipulation is based on the following:

1. Defendant filed a motion for summary judgment on February 5, 2016.
2. This is the first request for an extension of time to respond to these motions.
3. That the Plaintiff and Defendant have stipulated that an extension is in order.
4. That the Defendant's motion for Summary Judgment is voluminous. It is 31 pages long.
5. That the Plaintiff's attorney, Mr. Dan M. Winder, Esq., has a personal emergency that is requiring his attention to wit: 1) his widowed aunt suffered a fall with brain injury, 2) she has been hospitalized and is now at a hospice, 3) she has been removed from all life support and feeding tubes, 4) and the family is awaiting her death, 5) because his aunt had no children and was widowed, Mr. Winder has taken on a primary role during this process to her death. Mr. Winder's attentions have been required on dealing with his aunt's circumstances over the past 15 days, which has prevented him from giving this answer it full attention.
6. That Mr. Winder, and his office, is scheduled for trial in State court in the case of State of Nevada vs. Robert Sharpe III (a copy of the docket is attached), said trial to begin on Tuesday the 1<sup>st</sup> of March, 2016. That Mr. Winder is court appointed in that matter and must take the lead

role in defending the matter. That Mr. Winder's client is facing 16 felony charges with a maximum penalty of life without parole. That Mr. Winder, when not attending to his aunt's matters, expects to be consumed with preparation of this weighty state matter.

10. This is a good faith request made not for the purpose of delay.

Accordingly, Plaintiff requests that time to respond the Motions for Summary Judgment #50 be extended to the 4<sup>th</sup> day of March, 2016, and the Defendant's reply be extended a corresponding 4 days.

DATED this 26th day of February, 2016

DATED this 26th day of February, 2016

LAW OFFICE OF DAN M. WINDER, P.C.

MORRIS, SULLIVAN, LEMKUL &  
PITEGOFF

By: /s/ Scott C. Dorman  
DAN M. WINDER, ESQ.  
Nevada Bar No. 1569  
SCOTT C. DORMAN, ESQ.  
Nevada Bar No. 13108  
3507 W Charleston  
Las Vegas, Nevada 89118  
Telephone: (702) 474-0523  
*Attorneys for Plaintiff*

By: /s/ Jeffrey I. Pitegoff  
JEFFREY I. PITEGOFF, ESQ.  
Nevada Bar No. 5458  
DANIEL S. CEREGHINO, ESQ.  
Nevada Bar No. 11534  
3770 Howard Hughes Parkway, Suite 170  
Las Vegas, Nevada 89169  
Telephone: (702) 405-8100  
*Attorney for Defendants*

IT IS SO ORDERED this 2nd day of March, 2016.



RICHARD F. BOULWARE, II  
United States District Judge

**CERTIFICATE OF SERVICE**

Pursuant to LR 5-1, I hereby certify that I am an employee of the LAW OFFICE OF DAN M. WINDER, P.C., and that on the \_\_\_\_th day of \_\_\_\_\_, 2016, I served the foregoing **STIPULATION AND ORDER REGARDING THE DEADLINES FOR RESPONSE AND REPLY TO THE DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** as follows:

E-Service pursuant to LR 5-4:

Jeffrey I. Pitegoff, Esq.  
Nevada State Bar No. 5458  
Daniel S. Cereghino, Esq.  
Nevada State Bar No. 11534  
MORRIS, SULLIVAN, LEMKUL & PITEGOFF  
3770 Howard Hughes Parkway, Suite 170  
Las Vegas, Nevada 89169  
Tel: (702) 405-8100; Fax: (702) 405-8101  
pitegoff@morrisullivanlaw.com

*Attorney for Defendants University Medical Center,  
Doug Spring, Glen MacIntyre, and Steve Winkle*

\_\_\_\_\_  
Employee of the Law Office of Dan M. Winder P.C.

[Skip to Main Content](#) [Logout](#) [My Account](#) [My Cases](#) [Search Menu](#) [New District Criminal Search](#) [Refine Search](#) [Back](#)

Location : District Court Criminal [Images](#) [Help](#)

## REGISTER OF ACTIONS

CASE No. C-14-301364-1

State of Nevada vs Robert Sharpe, III

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Case Type: **Felony/Gross Misdemeanor**

Date Filed: **10/03/2014**

Location: **Department 2**

Cross-Reference Case Number: **C301364**

Defendant's Scope ID #: **1963406**

Grand Jury Case Number: **13BGJ160**

ITAG Case ID: **1635222**

### RELATED CASE INFORMATION

#### Related Cases

C-14-301364-2 (Multi-Defendant Case)

### PARTY INFORMATION

<b>Defendant</b>	<b>Sharpe, Robert, III</b> 2502 SPANISH FORK NORTH LAS VEGAS, NV 89031 SID: NV1963406 Other Agency Numbers 1963406 Justice Court Scope ID Subject Identifier, XJ90C1BE XID Subject Identifier, 1963406 Scope ID Subject Identifier	Male 5' 8", 160 lbs	<b>Lead Attorneys</b> <b>Arnold Weinstock, ESQ</b> <i>Retained</i> 702-474-0631(W)
------------------	---	------------------------	---

<b>Plaintiff</b>	<b>State of Nevada</b>	<b>Steven B Wolfson</b> 702-671-2700(W)
------------------	------------------------	--

### CHARGE INFORMATION

Charges: Sharpe, Robert, III	Statute	Level	Date
1. CONSPIRACY TO COMMIT SEX TRAFFICKING	201.300.2	Felony	03/01/2014
2. SEX TRAFFICKING	201.300.2	Felony	03/01/2014
3. LIVING FROM THE EARNINGS OF A PROSTITUTE	201.320	Felony	03/01/2014
4. CONSPIRACY TO COMMIT KIDNAPPING	200.310.1	Felony	03/01/2014
6. FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.310.1	Felony	03/01/2014
6. BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
7. BATTERY WITH USE OF A DEADLY WEAPON	200.481.2e1	Felony	03/14/2014
8. BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
9. BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM	200.481.2e2	Felony	03/01/2014
10. BATTERY BY STRANGULATION	200.481.2b	Felony	03/01/2014
11. FIRST DEGREE KIDNAPPING	200.310.1	Felony	03/01/2014
11. ASSAULT WITH USE OF A DEADLY WEAPON	200.471.2b	Felony	03/01/2014
12. MAYHEM WITH USE OF A DEADLY WEAPON	200.280	Felony	03/01/2014
13. INVOLUNTARY SERVITUDE WITH SUBSTANTIAL BODILY HARM	200.463.2a	Felony	03/01/2014
14. FIRST DEGREE KIDNAPPING RESULTING IN SUBSTANTIAL BODILY HARM WITH USE OF A DEADLY WEAPON	200.310.1	Felony	03/01/2014
15. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING PROSECUTION	199.480.3	Gross Misdemeanor	03/01/2014
16. PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION	199.305	Felony	03/01/2014
17. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING *...*	199.480.3	Gross Misdemeanor	03/01/2014
18. PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION	199.305	Felony	03/01/2014

### EVENTS & ORDERS OF THE COURT

#### DISPOSITIONS

01/22/2015 (Judicial Officer: Silver, Abbi)  
 11. FIRST DEGREE KIDNAPPING

2/26/2016	Dismissed
01/22/2015	(Judicial Officer: Silver, Abbi) 6. FIRST DEGREE KIDNAPPING WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM Dismissed
02/04/2015	(Judicial Officer: Silver, Abbi) 17. CONSPIRACY TO PREVENT OR DISSUADE A WITNESS OR VICTIM FROM REPORTING A CRIME OR COMMENCING *...* Amended Information Filed/Charges Not Addressed 18. PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION Amended Information Filed/Charges Not Addressed
	<b>OTHER EVENTS AND HEARINGS</b>
10/03/2014	<u>Indictment</u> Indictment
10/03/2014	<u>Warrant</u> Indictment Warrant
10/03/2014	<u>Indictment Warrant Return</u> (11:45 AM) (Judicial Officer Togliatti, Jennifer) <u>Parties Present</u> <u>Minutes</u> Result: Matter Heard
10/06/2014	<u>Indictment Warrant Return</u>
10/08/2014	<u>Media Request and Order</u> Media Request And Order Allowing Camera Access To Court Proceedings
10/09/2014	<u>Initial Arraignment</u> (9:00 AM) (Judicial Officer Silver, Abbi)
10/09/2014	<u>Indictment Warrant Return</u> (9:00 AM) (Judicial Officer Silver, Abbi)
10/09/2014	<u>All Pending Motions</u> (9:00 AM) (Judicial Officer Silver, Abbi) <u>Parties Present</u> <u>Minutes</u> Result: Plea Entered
10/13/2014	<u>Media Request and Order</u> Media Request And Order Allowing Camera Access To Court Proceedings
10/14/2014	<u>Motion</u> Motion for Setting of Reasonable Bail
10/17/2014	<u>Transcript of Proceedings</u> Reporter's Transcript of Proceedings, Grand Jury Hearing, October 2, 2014
10/21/2014	<u>Motion for Own Recognizance Release/Setting Reasonable Bail</u> (9:00 AM) (Judicial Officer Silver, Abbi) Defendant's Motion for Setting of Reasonable Bail <u>Parties Present</u> <u>Minutes</u> Result: Denied
10/21/2014	<u>Opposition</u> State's Opposition to Defendant's Motion For The Setting Or Reasonable Bail Filed Under Seal
10/23/2014	<u>Media Request and Order</u> Media Request And Order Allowing Camera Access To Court Proceedings
10/23/2014	<u>Media Request and Order</u> Media Request And Order Allowing Camera Access To Court Proceedings
10/28/2014	<u>Stipulation and Order</u> Stipulation and Order for Extension of Deadline to File PreTrial Writ of Habeas Corpus
11/07/2014	<u>Petition</u> Petition for Writ of Habeas Corpus
11/19/2014	<u>Order</u> Order
11/20/2014	<u>Return</u> State's Return to Writ of Habeas Corpus
11/21/2014	<u>Writ</u> Writ of Habeas Corpus
01/15/2015	<u>Notice of Witnesses and/or Expert Witnesses</u> Notice of Witnesses and/or Expert Witnesses
01/16/2015	<u>Reply</u> Defendant's Reply to the State's Return to the Writ of Habeas Corpus
01/16/2015	<u>Reply</u> Defendant's Reply to the State's Return to the Writ of Habeas Corpus
01/22/2015	<u>Petition for Writ of Habeas Corpus</u> (9:00 AM) (Judicial Officer Ames, Jack B.) <u>Parties Present</u> <u>Minutes</u> 01/20/2015 Reset by Court to 01/22/2015 Result: Granted in Part
01/27/2015	<u>Notice of Motion</u> Notice of Motion and Motion to Prohibit Disclosure of Victim's Address
02/04/2015	<u>Amended Indictment</u> Amended Indictment
02/13/2015	<u>Opposition</u> Defendant's Opposition to State's Motion to Prohibit Disclosure of Victim's Address
02/17/2015	<u>Motion</u> (9:00 AM) (Judicial Officer Bonaventure, Joseph T.) 02/17/2015, 02/19/2015, 04/02/2015, 04/09/2015, 05/21/2015 Notice of Motion and Motion to Prohibit Disclosure of Victim's Address

Parties PresentMinutes

04/30/2015 Reset by Court to 05/21/2015

Result: Continued

02/19/2015 **Calendar Call** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)

Result: Set Status Check

02/19/2015 **Status Check** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)**02/19/2015, 04/02/2015, 04/09/2015**

Status Check: New Counsel

Result: Continued

02/19/2015 **All Pending Motions** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)Parties PresentMinutes

Result: Matter Heard

02/20/2015 **Media Request and Order**

Media Request And Order Allowing Camera Access To Court Proceedings

02/23/2015 **CANCELED Jury Trial** (9:00 AM) (Judicial Officer Silver, Abbi)

Vacated - per Judge

03/31/2015 **Reply**

State's Reply to Defendant's Opposition to State's Motion to Prohibit Disclosure of Victim's Address

04/02/2015 **Status Check** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)**04/02/2015, 04/09/2015**

Status Check: Resetting Trial

Result: Continued

04/02/2015 **All Pending Motions** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)

Status Check: Resetting Trial, Status Check: New Counsel and Notice of Motion and Motion to Prohibit Disclosure of Victim's Address

Parties PresentMinutes

Result: Continued

04/09/2015 **All Pending Motions** (9:00 AM) (Judicial Officer Bonaventure, Joseph T.)

Status Check: Resetting Trial, Status Check: New Counsel and Notice of Motion and Motion to Prohibit Disclosure of Victim's Address

Parties PresentMinutes

Result: Decision Made

04/13/2015 **Substitution of Attorney**

Substitution Attorneys

05/04/2015 **Case Reassigned to Department 2**

Case reassigned from Judge Abbi Silver Dept 15

08/18/2015 **Motion**

Motion to Withdraw as Counsel of Record

08/26/2015 **Receipt of Copy**

Receipt of Copy

09/01/2015 **Motion to Withdraw as Counsel** (9:00 AM) (Judicial Officer Scotti, Richard F.)

Dan M Winder's Motion to Withdraw as Counsel of Record

Parties PresentMinutes

Result: Motion Granted

09/10/2015 **Media Request and Order**

Media Request And Order Allowing Camera Access To Court Proceedings

09/17/2015 **CANCELED Calendar Call** (8:30 AM) (Judicial Officer Scotti, Richard F.)

Vacated - per Judge

09/17/2015 **Order to Withdraw as Attorney of Record**

Order

09/21/2015 **CANCELED Jury Trial** (10:00 AM) (Judicial Officer Scotti, Richard F.)

Vacated - per Judge

09/29/2015 **Status Check** (9:00 AM) (Judicial Officer Scotti, Richard F.)**09/29/2015, 10/08/2015**

Status Check: Counsel

Parties Present

Result: Matter Continued

09/29/2015 **Trial Setting** (9:00 AM) (Judicial Officer Scotti, Richard F.)**09/29/2015, 10/08/2015**Parties Present

Result: Matter Continued

09/29/2015 **All Pending Motions** (9:00 AM) (Judicial Officer Scotti, Richard F.)Parties PresentMinutes

Result: Matter Heard

10/08/2015 **All Pending Motions** (9:00 AM) (Judicial Officer Scotti, Richard F.)Parties PresentMinutes

Result: Trial Date Set

10/29/2015 **Request** (9:00 AM) (Judicial Officer Scotti, Richard F.)

State's Request to Address Trial Date

Parties Present



Minutes  
Result: Denied Without Prejudice

11/06/2015 Motion  
*Notice of Motion and Motion for Trial Phase Discovery*

11/13/2015 Opposition to Motion  
*State's Opposition to Defendant's Motion for Trial Phase Discovery*

11/17/2015 Motion for Discovery (9:00 AM) (Judicial Officer Scotti, Richard F.)  
*Defendant's Notice of Motion and Motion for Trial Phase Discovery*

Parties Present

Minutes  
Result: Granted in Part

01/27/2016 Ex Parte Motion  
*Ex Parte Application to Declare Defendant Indigent*

01/28/2016 Supplemental Witness List  
*Supplemental Notice of Witnesses and/or Expert Witnesses*

01/29/2016 Supplemental Witness List  
*Second Supplemental Notice of Witnesses and/or Expert Witnesses [NRS 174.234]*

02/09/2016 Calendar Call (9:00 AM) (Judicial Officer Scotti, Richard F.)

Parties Present

Minutes  
*02/11/2016 Reset by Court to 02/09/2016*

Result: Trial Date Set

02/16/2016 CANCELED Jury Trial (10:00 AM) (Judicial Officer Scotti, Richard F.)  
*Vacated*

02/16/2016 Notice of Witnesses and/or Expert Witnesses  
*Notice of Defense Witness List*

02/18/2016 Receipt of Copy  
*Receipt of Copy*

02/19/2016 Notice of Witnesses and/or Expert Witnesses  
*Notice of Expert Witnesses*

02/22/2016 Supplemental Witness List  
*Third Supplemental Notice of Witnesses and/or Expert Witnesses*

02/23/2016 Status Check (9:00 AM) (Judicial Officer Scotti, Richard F.)  
**02/23/2016, 02/25/2016**  
*02/16/2016 Reset by Court to 02/23/2016*

02/23/2016 Ex Parte Motion  
*Ex Parte Motion and Order to Compel Appearance of Dr. Jeffrey Lewis, Lt. Col. USAF*

02/29/2016 CANCELED Jury Trial (10:00 AM) (Judicial Officer Scotti, Richard F.)  
*Vacated*

03/01/2016 Jury Trial - FIRM (11:00 AM) (Judicial Officer Scotti, Richard F.)